

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

Lordstown Motors Corp., *et al.*,  
  
Debtors.

Chapter 11

Case No. 23-10831 (MFW)

Jointly Administered

**NOTICE OF APPEARANCE AND  
REQUEST FOR SERVICE OF NOTICES AND PAPERS**

**PLEASE TAKE NOTICE** that Morris, Nichols, Arsht & Tunnell LLP and Allen & Overy LLP hereby enter their appearance (this “Notice of Appearance”) in the above-captioned cases as counsel to represent Hon Hai Precision Industry Co., Ltd. (a/k/a Hon Hai Technology Group), Foxconn EV Technology, Inc., Foxconn Ventures Pte. Ltd., Foxconn (Far East) Limited, Foxconn EV Property Development LLC and Foxconn EV System LLC (collectively, the “Foxconn Parties”), pursuant to section 1109(b) of title 11 of the United States Code, Rules 2002, 3017(a), 9007, and 9010 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Rule 2002-1(d) of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), and request that copies of any and all notices and papers filed or entered in these cases be given to and served upon the following:

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**PLEASE TAKE FURTHER NOTICE** that this constitutes not only a request for service of the notices and papers referred to in the Bankruptcy Rules or Local Rules, but also includes, without limitation, a request for service of all orders and notices of any application, motion, petition, pleading, request, complaint, or demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, courier service, hand delivery,

telephone, facsimile transmission, email or otherwise, that (1) affects or seeks to affect in any way any rights or interests of any creditor or party in interest in these cases, with respect to (a) the debtors in the above-captioned cases (the “Debtors”) and any related adversary proceedings, whether currently pending or later commenced, (b) property of the Debtors’ estates, or proceeds thereof, in which the Debtors may claim an interest, or (c) property or proceeds thereof in the possession, custody, or control of others that the Debtors may seek to use, or (2) requires or seeks to require any act or other conduct by a party in interest.

**PLEASE TAKE FURTHER NOTICE** that this Notice of Appearance and any subsequent appearance, pleading, claim, or suit is not intended nor shall be deemed to waive the rights of the Foxconn Parties: (1) to have an Article III judge adjudicate in the first instance any case, proceeding, matter, or controversy as to which a bankruptcy judge may not enter a final order or judgment consistent with Article III of the United States Constitution; (2) to have final orders in a non-core case, proceeding, matter, or controversy entered only after an opportunity to object to proposed findings of fact and conclusions of law and a de novo review by a district court judge; (3) to trial by jury in any case, proceeding, matter, or controversy so triable; (4) to have the reference withdrawn by the United States District Court in any case, proceeding, matter, or controversy subject to mandatory or discretionary withdrawal; or (5) any other rights, claims, actions, defenses, setoffs, or recoupments to which the Foxconn Parties are or may be entitled under agreements, in law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments expressly are hereby reserved. For the avoidance of doubt, filing this notice is not intended as, and shall not be, the Foxconn Parties’ consent to the jurisdiction of the Bankruptcy Court or the entry of final orders and judgments in any case, proceeding, matter, or controversy if

it is determined that the Court, consistent with Article III of the United States Constitution does not have such authority.

**PLEASE TAKE FURTHER NOTICE** that, by this Notice of Appearance and pursuant to Local Rule 9010-2(a), Allen & Overy LLP is substituted as counsel to the Foxconn Parties, and Paul Hastings LLP hereby withdraws its appearance for the Foxconn Parties in these chapter 11 cases, including the adversary proceeding captioned *Lordstown Motors Corp. v. Hon Hai Precision Industry Co. Ltd. (a/k/a Hon Hai Technology Group), et al.*, Case No. 23-50414 (MFW). Paul Hastings LLP will no longer represent the Foxconn Parties in these cases, and all such representations will be undertaken by Allen & Overy LLP and Morris, Nichols, Arsht & Tunnell LLP.

*(Signature pages follow)*

Dated: November 8, 2023  
Wilmington, Delaware

**MORRIS, NICHOLS, ARSHT &  
TUNNELL LLP**

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